

*The Medina County Environmental Action Association, Inc.*

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January 9, 2005

Ms. Victoria Rutson,  
Chief, SEA Section  
Surface Transportation Board  
1925 K Street NW  
Washington, D.C. 20423-0001

*received  
1/11/05*

*EI-1353*

Re: Subject Finance Docket 324 84 Southwest Gulf Railroad

Dear Ms Rutson:

I was very disappointed in the quality and accuracy of this DEIS. In almost every instance, SEA concludes that there is little or no impact, when we who live here and are familiar with the terrain can see that there would be a tremendous impact from the various issues surrounding this project. I could go on and on about the error in this DEIS that are obvious even to a lay person like myself. Virtually every finding is in favor of VMC/SGR, and minimizes the real impacts to the area. When the DEIS does acknowledge a problem, it leaves the solution up to SGR to handle during construction or operation of the project. This is unacceptable. I became very angry as I read through this DEIS. There were many things that I saw wrong every time I turned another page that I just could not list them all here.

**Some** of the most flagrant and noticeable errors and omissions are:

- The effect on the human environment has not been given adequate study.
- The socioeconomic factor of changing the land use of the area from historic/agricultural/residential to commercial/industrial as Vulcan proposes to do did not get ANY consideration.
- The financial effect of loss of hunting in the area did not get any consideration.
- The cost of lost opportunities from the economy due to being replaced by the VMC/SGR project did not get any consideration.
- The effect of this project on the flooding situation in the Quihi floodplain did not get covered.
- Vol I page 4-100, 4.17 Cumulative impacts . The actions that will be taken are definitely not "*individually minor*" in our estimation. Please list in the EIS those actions that you are referring to as "*individually minor*"
- Vol I page 4-102, SGR says that "the entire quarry site has been used primarily for cattle grazing with small areas used for hay and other crop production". SGR omitted the fact that this area, like the surrounding area, has been and is being used for hunting, which is a major economic activity in this area. Many landowners and ranchers depend on the income from hunting leases.
- Please inform us what Vulcan's 400 foot buffer zone will protect us from (page 4-102). This seems like an awfully small buffer zone compared to the size of the quarry.
- page 4-105, Transportation to Local Markets: SEA states that SGR informed them that there would be 24 round trips per day by trucks for local markets in addition to the rail transport of product. That is not true. Vulcan said that there would be 850 trucks per day if there were no rail. Vulcan told us many times that there would be 10 to 20 percent of product sold to local markets and not transported by rail. That would be 85 to 170 trucks per day, not 24. Now, what is the truth? Thus the figures SEA used for their comparison chart of accidents, injuries, and fatalities in Table 4.17.2 are all wrong. Moreover, Vulcan said there would be 125 to 150 employees when they told us how good it would be

to have all those jobs in Medina County. Yet, when it comes to figuring the impact on traffic they say there will be 100 employees. Now, which is it - 100, or 125 to 150? And what about the 24 railroad employees? What about supervisory and contract personnel? What about the increase in population from the new and planned subdivisions? Also, you are using year 2000 figures, which are out-dated and based on all highways in Texas ( and presumably includes highways where little risk is encountered). It appears to me that SEA's computations are drastically wrong about the traffic impacts. Using the correct figures will show that there will be many more accidents injuries, and deaths. SGR is trying to get out of building overpasses over the affected roads. By the way, where is CR 364?

- Vol I, page 4-107, 108 Water Resources "SEA preliminarily concludes that the cumulative impacts to water resources, including surface water and groundwater, would not be significant." Apparently, SEA is not aware of the fact, even though many people have told them repeatedly in their letters, that landowners in the quarry area and surrounding area have very shallow Edwards Aquifer water wells. These wells are their only source of water. There is no public water supply system in this area. To place and maintain a public water supply in those rugged hills would be very difficult. Some of these wells are within 1/4 mile or less from Vulcan's first quarrying area! These wells range from approximately 180 to 350 feet deep, with water levels as high as 140 feet from the surface of the land. Vulcan plans to mine approximately 250 feet. And yet SEA concludes that impacts "would not be significant"?!
- Regarding TCEQ's regulations that are supposed to protect the aquifer, there really aren't any. Fines do not undo the pollution damage to the aquifer.
- Vol I, page 4-42, 4.6.1 Methodology. SEA used aerial photography maps that were nine years old to evaluate the vegetative cover of the proposed and alternate routes. The vegetative cover has changed in the past nine years.
- Vol I pictures. Captions are incorrect and do not go with the pictures. For example, Creekwood, a subdivision of 125 plus homes, is shown as a water tank with brush around it. Is this an attempt to minimize the effect on Creekwood? My home is shown as "Lakefront Property". Is this someone's sick idea of a joke?
- Vol I, page 4-99, 4.16 Socioeconomic Impacts. How nice to be able to treat this most important issue in one and one-half pages. (This study should have covered the effects on the HUMAN environment, but instead only mentioned that in passing, somewhere in the beginning of this DEIS. In this section, SEA offhandedly concludes that there would be no significant socioeconomic impacts as a result of the proposed action.
- Regarding property values, SEA avoids addressing the issue by declaring that "the impacts to property values cannot be predicted accurately at this time". How about predicting them anyway. We already know what will happen to property values. They will fall.

The issue of Vulcan, a private company, taking our land for their own use by condemnation was not covered. As I mentioned in the beginning, I am not satisfied with this DEIS, and I could write much more. I thank you very much for allowing us to submit our comments on this proposed project,

Sincerely



Alyne Fitzgerald